

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	
Cook County Sheriff Thomas Dart, et al.)	Judge Tharp, Jr.
)	
Defendants.)	
)	

**AGREED MOTION FOR EXTENSION
OF TIME TO SUBMIT ORDER REGARDING
INSPECTION AND CONFIDENTIALITY ORDER**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, and Plaintiff, EUGENE WESTMORELAND, by and through his Attorneys, Patrick Morrissey and Thomas Morrissey, pursuant to Fed. R. Civ. P. 6(b), and for their Agreed Motion for Extension of Time to Submit Order Regarding Inspection and Agreed Confidentiality Order Language to the Court, state as follows:

1. Counsel for both parties have been in communication relating to this motion, diligently working toward resolution and all are in agreement.
2. This Court's July 7, 2023, Order directed the parties to submit a proposed order to the court regarding an inspection of two ramps on or before July 20, 2023. ECF No. 19.
3. This Court's July 13, 2023, Order directed the parties to come to an agreement regarding language for a confidentiality order based on the Court's model order and to submit the same to the Court on or before July 20, 2023. ECF No. 24.
4. On July 20, 2023, Defendants' counsel learned that there may be documents subject to a confidentiality order. These documents are not yet in possession of Defendants' counsel.

5. Defendants provided four potential dates for inspection, but they were not workable for plaintiff's consulting expert. Plaintiff's counsel had previously advised that his expert was available on Mondays and Fridays, generally, but those dates were not workable for the CCDOC escort.
6. Counsel for the parties are still working together to fine tune the specific language of the proposed confidentiality order at this time and will not be able to have the red-lined language submitted to the Court on July 20, 2023 as ordered.
7. The parties therefore request a 4-day extension of time, until July 24, 2023, to submit to the Court the parties' Agreed Proposed Confidentiality Order.
8. Under Rule 6(b), this Court may, for good cause, extend the time "[w]hen an act may or must be done." Fed. R. Civ. P. 6(b).
9. Not granting an extension of time would prejudice the parties because the current July 20, 2023, deadline will not allow sufficient time to come to a complete agreement regarding the outstanding details of the language of the Confidentiality Order.
10. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, the parties respectfully request that this Honorable Court enter an order as follows:

1. The Parties' Agreed Motion for Extension of Time is granted;
2. The Parties shall submit an order regarding inspection and a red-lined version and clean copy of their Proposed Agreed Confidentiality Order language to the court's Proposed Order Email Address on or before July 24, 2023.

Respectfully Submitted,

Defendants

By: /s/ Jason E. DeVore

Jason E. DeVore, One of the Attorneys
for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Extension of Time was filed on July 20, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman